



Transmission Business Line (TBL)

Customer Comments and BPAT Responses

Energy Imbalance Service Business Practice, Revision 2

For OATT of 10/01/01 and
the Ancillary and Control Area Service Rate Schedule Effective October 1, 2003

Posted September 19, 2003

This document contains the customer comments on the Energy Imbalance Services, Revision 2 business practice draft, posted 07/30/2003, and the responses to those comments from Bonneville Power Administration Transmission Business Line (BPAT).

Thank-you for your comments.

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Comments from Bonneville Power Administration, Power Business Line (PBL)

Sarah Bermejo submitted comments on behalf of the Power Business Line on August 12, 2003

General Comment

The Table of Contents lettering sequence for #1 shows two letter "E's". The second letter "E" should be displayed as "F". Also, for the first instance of "E" - PBL suggests adding the word "*Deviation*" after "*Within*".

BPAT Response

BPAT agrees with your suggestion and will make the change.

Section I.B:

PBL suggests deleting the last sentence after BPAT, because Section E specifies how the accounting works for Band 1.

BPAT Response

BPAT agrees with your suggestion and will make the change.

Section I.C.1:

PBL suggest adding the word "*either*" between may and reaffirm.

BPAT Response

BPAT disagrees with your suggestion.

Section I.C.2 and remainder of BP:

PBL suggests using the same language contained in the Operating Reserves Business Practice for Self-Supply and Third Party by referring to either election as the "Supplier" which define the terms Self-Supply and Third Party Supply (Section I.C.2). TBL can then delete all specific references to Self-Supply in Section III.A such that provisions contained throughout the document will apply to either election.

BPAT Response

BPAT will consider this suggestion and make changes where it does not affect the meaning. It is appropriate to keep the criteria primarily for Self-supply as that is the only use at present.

Section I.D.2:

What is the consequence of the Load Estimate submitted over the CWI and the Scheduled Load values not being equal? PBL believes this should result in a strike. And, in the event the numbers are different, what is used for billing?

BPAT Response

The Load Estimate is not used for billing so BPAT see no need for a strike. Section D defines that the imbalance is the difference between the actual and the Scheduled Load. The Load Estimate, as noted in section D.3, is used as a check and to research billing errors.

Section I.D.3:

How are payback schedules factored into the overall Energy Imbalance calculation?

BPAT Response

Payback Schedules are used to reduce the deviation balance in Deviation Band 1. This is explained in section I.E.

Section I.E.2:

PBL suggest making the Band 1 positive and negative payback schedule descriptions two separate paragraphs.

BPAT Response

BPAT agrees with your suggestion and will make the change.

Section I.E.4:

PBL suggest replacing this section with the following: *"Under the 2002 Transmission and Ancillary Service Rate Schedules, deviation account balances at the end of the month carryover to the next month. In order to transition to the 2004 Transmission and Ancillary Service Rate Schedules, TBL must settle financially for any deviation account balance remaining on September 30, 2003. This settlement will be consistent will be at the average Mid-C price for the month."*

BPAT Response

BPAT will not change this section. The settlement procedure is specified in the Business Practice, not the 2002 Rate Schedule.

Section I.F:

This is a new section and needs to be formatted to have bold lettering, a title, and consistent indentation. The wording is very awkward so PBL suggests the following: *"The settlement for days when the Federal System is in Spill condition is described in Section II.D.2.b of the 2004 Rate Schedules. No credit is given for negative deviations in any band or for negative Payback Schedules."*

BPAT Response

BPAT agrees with the suggestion and will make the change.

Section II.A.3:

PBL suggest adding *"a portion of the Control Area"* before imbalance needs, and add a reference to Section II.C.3 for how the calculation is done.

BPAT Response

BPAT will add the phrase.

Section II.B.2a&b:

PBL suggest replacing "Transmission Customer" with "Generating Resource".

BPAT Response

The section is correct as stands and BPAT will not change this section.

Section II.B.3.a:

PBL suggest rewording the last sentence as follows: *"BPAT will review the details of the potential strike with the customer prior to determining if the occurrence results in a strike"*.

BPAT Response

BPAT agrees with your suggestion and will make the change.

Section II.B.3.b:

PBL suggest adding the following at the beginning of the sentence: *"In the event BPAT determines a strike occurred pursuant to 3.a above, BPAT will"...*

BPAT Response

BPAT agrees with your suggestion and will make the change.